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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 **In the Matter of the Accusation Against:**

Case No. 2013-739

13 **ACCUSATION**

14 **LEANN RENE BEVERLY**
a.k.a. LEANN BEVERLY
3663 Solano Avenue, Apt. 24
Napa, CA 94558

15 **Registered Nurse License No. 653688**

16 Respondent.

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19 Complainant alleges:

20 **PARTIES**

21 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
22 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
23 Consumer Affairs.

24 2. On or about March 2, 2005, the Board of Registered Nursing issued Registered Nurse
25 License Number 653688 to Leann Rene Beverly a.k.a. Leann Beverly (Respondent). The
26 Registered Nurse License was in full force and effect at all times relevant to the charges brought
27 in this Accusation and expired on July 31, 2006.
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1 COST RECOVERY

2 8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
3 administrative law judge to direct a licensee found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case, with failure of the licensee to comply subjecting the license to not being
6 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
7 included in a stipulated settlement.

8 DRUGS

9 9. Lovenox (enoxaparin) is an anticoagulant (blood thinner) used to prevent and treat
10 deep vein thrombosis or pulmonary embolism, and is given as a subcutaneous injection (by a
11 health care provider or the patient).

12 10. Heparin is an anticoagulant (blood thinner) that prevents the formation of blood clots.
13 Heparin is used to treat and prevent blood clots in the veins, arteries, or lung. Heparin is also
14 used before surgery to reduce the risk of blood clots.

15 11. Keppra (levetiracetam) is an anti-epileptic drug, also called an anticonvulsant. Keppra
16 is used to treat partial onset seizures in adults and children who are at least 1 month old. Keppra
17 is also used to treat tonic-clonic seizures in adults and children who are at least 6 years old, and
18 myoclonic seizures in adults and children who are at least 12 years old.

19 CAUSE FOR DISCIPLINE

20 (Unprofessional Conduct - Out of State Discipline)
(Bus. & Prof. Code § 2761, subd. (a)(4))

21 12. Respondent has subjected her registered nurse license to disciplinary action under
22 Code section 2761, subdivision (a)(4), in that on or about May 15, 2012, in a disciplinary action
23 before the Virginia State Board of Nursing (Virginia Board), the Virginia Board issued a Consent
24 Order indefinitely suspending Respondent's nursing license.

25 13. The Virginia Board's Consent Order enumerated the following requirements and
26 conditions for the reinstatement of Respondent's license: (1) at such time as Respondent shall
27 petition the Virginia Board for reinstatement of her license, an administrative proceeding will be
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1 convened to determine whether Respondent is capable of resuming the safe and competent
2 practice of professional nursing; (2) the suspension of Respondent's license applies to any
3 multistate privilege to practice professional nursing. For the duration of the Consent Order,
4 Respondent shall not work outside of the Commonwealth of Virginia pursuant to multistate
5 licensure privilege without the written permission of the Virginia Board and the Board of Nursing
6 in the party state where Respondent wishes to work; (3) the suspension of Respondent's license
7 shall be stayed upon proof of entry into a Board-approved R.N. refresher course, consisting of
8 both classroom and clinical components; (4) Respondent must submit proof of successful
9 completion of the refresher course within six months after the date that the Consent Order is
10 entered; (5) Respondent shall not practice nursing without Board approval until her license is
11 reinstated without restriction; (6) upon receipt of all required documentation, the Virginia Board
12 may request that Respondent reappear before a Special Conference Committee in order to make a
13 final disposition of the matter; (7) any violation of the terms and condition stated in the Consent
14 Order shall be reason for summarily rescinding the stay of indefinite suspension of the
15 Respondent's license and an administrative proceedings shall be held to determine whether her
16 license shall be revoked. The Consent Order also required Respondent to pay any fees that may
17 be required for the reinstatement and renewal of the license prior to issuance of the license to
18 resume practicing. The circumstances of the Virginia Board's Order are as follows:

19 14. During the course of her employment with Carilion Clinic Roanoke Memorial
20 Hospital, Respondent administered 60 mg of Lovenox (enoxaparin) by injection to Patient A
21 without a physician's order. Furthermore, Respondent failed to document the administration in
22 Patient A's record, though she did report the error to her supervisor.

23 15. On or about February 9, 2011, Respondent failed to administer Patient B's 2:00 p.m.
24 dose of heparin as ordered. Respondent did not report his missed dose to Patient B's physician.
25 She advocated to the on-coming nurse to administer the patient's 2:00 p.m. dose at 5:00 p.m.,
26 stating that it could be given at that time. Ultimately, Patient B did not receive the 2:00 p.m. dose
27 on that date. On that same date, respondent failed to document administration of Keppra
28 (levetiracetam) at 3:00 p.m. to Patient C.

16. On or about January 27, 2011, Respondent failed to transfer Patient D in a timely manner following an ordered Stat transfer to the intensive care unit for respiratory distress.

17. On or about February 16, 2011, Respondent discharged Patient E and indicated in his medical record that the patient left the unit with a hospital transport to his home. Patient E did not have a transport as Respondent had not arranged one for him. In addition, she charted on February 16, 2011, that another nurse would be handling the discharge on the following day and that she had notified Patient E's physician, which was false. Also, on the same day, while giving a report on four individual patients, Respondent allowed a hospital visitor to view confidential health information when she scrolled through patient records in full view of the visitor and verbalized their content.

18. Respondent admitted each and every incident found in the Virginia Board's Consent Order and waived her right to contest any of the findings in any subsequent proceeding before the Board.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters alleged here, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 653688, issued to Leann Rene Beverly a.k.a. Leann Beverly;

2. Ordering Leann Rene Beverly a.k.a. Leann Beverly to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

3. Taking such other and further action as deemed necessary and proper.

DATED: March 13 2013

for Stacie Barr
LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant